

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

**Joint Commenters Initial Comments on the Performance and Tracking Metrics
Workshop Summary of the Illinois Commerce Commission**

We - the below-listed Joint Commenters - appreciate the opportunity to respond to the Performance and Tracking Metrics Workshop Summary (“Report”) of the Illinois Commerce Commission (“ICC”), submitted on December 1, 2021 in accordance with Section 220 ILCS 5/16-108.18(e) of the Climate and Equitable Jobs Act (“CEJA”), Public Act 102-0662. We appreciate the opportunity to provide feedback on this first, critical stage of CEJA implementation.

The Joint Commenters include members of and participants in discussions on the Performance and Tracking Metrics Workshops convened by the [Illinois Clean Jobs Coalition](#) (“ICJC”), however the views in these comments are our own and do not necessarily represent the view of that coalition.

Citizens Utility Board	Vote Solar
Illinois People’s Action	Central Illinois Healthy Community Alliance
Environmental Defense Fund	ACES 4 Youth
Environmental Law & Policy Center	Union of Concerned Scientists
Elevate	NRDC

The Joint Commenters thank the ICC for an exceptional job under very tight time constraints organizing and presenting the workshops, which provided valuable level-setting for stakeholders and will inform the metrics proceeding to be initiated in January. RMI likewise provided expert facilitation that allowed for an informed, transparent, inclusive and productive process. The Report is a thorough and accurate reflection of the information offered and gathered during the five workshops held in October.

The Report echoes the overarching tenets of CEJA, which are to accelerate progress on Illinois clean energy and environmental goals, hold electric utilities publicly accountable for their performance, increase public participation in regulatory matters, and to address institutionalized inequities. CEJA directs utilities to cost-effectively and equitably optimize the grid to ensure that the benefits of grid optimization and pollution reduction are shared across the utilities' territories. To effectuate these directives, CEJA makes clear that metrics must be designed to achieve specific outcomes: supplier diversity, locational reliability, peak load reduction, affordability, customer service and timely interconnection requests. Feedback from ICJC members demonstrated generally consistent priorities, which align with many other stakeholders, including the need for greater access to data to inform baselines so that metrics require exceptional performance beyond "business as usual," requiring heightened performance and prioritizing outcomes in economically and environmentally disadvantaged communities, and the need for third-party evaluation of customer service/satisfaction and reliability data. Many commenters agreed that ambitious targets should be set to require exceptional performance well beyond the status quo. While some high-level consensus on policy and priorities is apparent, the next stage of achieving CEJA's intent, objectives and goals is the metrics proceeding, in which stakeholders will have the opportunity to review historic data and propose meaningful measures of utility performance.

The Report's description of presentations and comments by stakeholders makes evident the material similarity of policy goals and priorities of many participants. The feedback provided through the workshops should guide the development of data-driven performance and tracking metrics that achieve optimal results and meet the State's environmental, economic and equity goals. Presumably all parties want to avoid the potential "metrics paradox" where different metrics result in conflicting outcomes. However, it is also likely that different metrics serve to enhance desired outcomes, like peak load reduction contributing to reduced distribution system and commodity costs, which will reduce customer bills and make service more affordable, in addition to reducing GHG emissions. This is a key example in how holistic system planning is integral to optimal utility performance.

It is also clear that much work is left to be done in developing specific values to assign to the individual metrics, including the substantial need for baseline data in all areas of utility performance. CEJA requires a minimum of one year of data for each performance metric, so that data will be important to stakeholders' evaluation of metrics values. The ICC must also satisfy the CEJA requirement that it develop a methodology to calculate net benefits that includes customer and societal costs and benefits and quantifies the effect on delivery rates, which will form the basis for assigning specific rewards and penalties to each metric. As many stakeholders make clear, **benefits must be particularly identifiable in economically and environmentally disadvantaged areas.**

CEJA's new performance-based multi-year ratemaking structure, which will include the performance and tracking metrics the ICC approves in the upcoming metrics docket, is intended to provide "targeted incentives. . . to enable alignment of utility,

customer, community, and environmental goals.” 220 ILCS 6/16-108.18(3). The workshops represented a first step to satisfying these objectives. The Joint Commenters look forward to contributing to the development of meaningful metrics that provide for optimal outcomes as we strive to implement CEJA to ensure the State’s transformational policy, equity, and environmental goals are achieved.

Dated: December 10, 2021

Respectfully Submitted,

Joint Commenters of the Illinois Clean Jobs Coalition